

1 CAL J. POTTER, III, ESQ.
Nevada Bar No. 1988
2 C. J. POTTER, IV, ESQ.
Nevada Bar No. 13225
3 POTTER LAW OFFICES
1125 Shadow Lane
4 Las Vegas, NV 89102
Ph: (702) 385-1954
5 Fax: (702) 385-9081
cpotter@potterlawoffices.com
6 *Attorneys for Plaintiff*

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 VIVIAN WRIGHT-BOLTON;

CASE NO.: 2:14-cv-01612-APG-PAL

11 Plaintiff,

12 v.

13 MELANIE ANDRESS-TOBIASSON,
individually; THE ESTATE OF JENNIFER
14 BOLTON deceased; KOCKA & BOLTON,
LLC, a Nevada Limited Liability Company;

15 Defendants.
16 _____/

17 **STIPULATION AND ORDER TO EXTEND PLAINTIFF'S RESPONSE TO**
18 **DEFENDANT ANDRESS-TOBIASSON'S MOTION TO STRIKE**

19 IT IS HEREBY STIPULATED AND AGREED, by and between the Plaintiff, VIVIAN
20 WRIGHT-BOLTON, by and through her counsel, CAL J. POTTER, III, ESQ. and C. J.
21 POTTER, IV, ESQ. of POTTER LAW OFFICES and Defendant, MELANIE ANDRESS-
22 TOBIASSON, by and through her counsel WALTER R. CANNON, ESQ. and THOMAS D.
23 DILLARD, JR, ESQ. of OLSON CANNON GORMLEY & STOBERSKI that the date for
24 Plaintiff to file her Response to Defendant Andress-Tobiasson's Motion to Strike [doc. 29]
25 currently due Friday, August 28, 2015 be extended five (5) days up to and including
26 Wednesday, September 2, 2015.

27 Plaintiff submits that good cause exists for this extension as Plaintiff's counsel has been
28 unable to complete the Response due to numerous court appearances, multiple depositions,

multiple mediations and court-ordered settlement conferences, and other deadlines, including but not limited to Ninth Circuit and Nevada Supreme Court appeal briefs. Based upon the foregoing, the parties request that this Court order the time for the Plaintiff to file her Reply to Wednesday, September 2, 2015.

This is the first request for enlargement of time is made in good faith and not for the purposes of delay.

DATED this 28th day of August, 2015.

POTTER LAW OFFICES

By /s/ C. J. Potter, IV, Esq.

CAL J. POTTER, III, ESQ.

Nevada Bar No. 1988

C. J. POTTER, IV, ESQ.

Nevada Bar No. 13225

1125 Shadow Lane

Las Vegas, NV 89102

Attorneys for Plaintiff

DATED this 28th day of August, 2015.

OLSON, CANNON, GORMLEY,
ANGULO & STOBERSKI

By /s/ Thomas D. Dillard, Jr., Esq.

WALTER R. CANNON, ESQ.

Nevada Bar No. 1505

THOMAS D. DILLARD, JR., ESQ.

Nevada Bar No. 6270

9950 W. Cheyenne Avenue

Las Vegas, NV 89129

Attorney for Defendant Melanie

Andress-Tobiasson

ORDER

It is so Ordered.

September 1, 2015

DATED



U.S. DISTRICT COURT JUDGE